

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO.</b> _____
<b>v.</b>	<b>:</b>	<b>DATE FILED:</b> _____
<b>JAN TORRES</b>	<b>:</b>	<b>VIOLATION:</b>
	<b>:</b>	<b>21 U.S.C. §841(a)(1), (b)(1)(B) (possession</b>
	<b>:</b>	<b>with intent to distribute 100 grams or</b>
	<b>:</b>	<b>more of heroin-1 count)</b>
	<b>:</b>	<b>21 U.S.C. §860 (possession with intent to</b>
	<b>:</b>	<b>distribute 100 grams or more of heroin in</b>
	<b>:</b>	<b>or near a school-1 count)</b>

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**INDICTMENT**

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**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

On or about March 14, 2006, in Philadelphia in the Eastern District of  
Pennsylvania, defendant  
**JAN TORRES**  
knowingly and intentionally possessed with intent to distribute 100 grams or more, that is,  
approximately 104 grams, of a mixture and substance containing a detectable amount of heroin, a  
Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 14, 2006, in Philadelphia, in the Eastern District of  
Pennsylvania, defendant

**JAN TORRES**

knowingly and intentionally possessed with intent to distribute 100 grams or more, that is,  
approximately 104 grams, of a mixture and substance containing a detectable amount of heroin, a  
Schedule I controlled substance, within 1,000 feet of the real property comprising Northwood  
Academy Charter School, a public elementary school, located in  
Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section  
841(a)(1),(b)(1)(B).

In violation of Title 21, United States Code, Section 860.

**A TRUE BILL:**

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**GRAND JURY FOREPERSON**

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**PATRICK L. MEEHAN**  
**United States Attorney**